



# Anti-slavery and human trafficking statement

## Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, associates, seconded workers, agents, contractors and suppliers.

Bedigital, a brand of DMSG Ltd, strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are passionate about building a fairer society and we are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

## What is the Modern Slavery Act 2015?

The Modern Slavery Act 2015 (the "Act") seeks to address the role of businesses in preventing modern slavery occurring in their supply chains and organisations. It applies to businesses of a certain size, who are required to publish a statement setting out the steps they have taken to ensure that modern slavery and human trafficking are not taking place in their business or supply chain. Although we are not above the size threshold, we are committed to corporate responsibility and transparency in our supply chain. This statement sets out the steps that we have and will continue to take as part of our ongoing commitment to keep slavery and human trafficking out of our business and our supply chains.

## Bedigital

We believe that the nature of our business as an IT services provider means that we are not directly exposed to a high risk of modern slavery and human trafficking. However, the risk of modern slavery and human trafficking may not always be obvious, and it is an important and ongoing risk for all businesses and organisations. We remain, therefore, committed to acting ethically and with integrity in all of our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

We want our suppliers and contractors to support our zero-tolerance approach to modern slavery, and we've taken the following commitments in support of this goal:

### Commitments

- We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.



- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
  - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

This statement is made pursuant to section 54(1) of the Act and constitutes our Slavery and Human Trafficking Statement for the financial year ending 5 April 2020. This statement was approved by bedigital Board of Directors on 1<sup>st</sup> August 2020.

A handwritten signature in black ink, appearing to read "P. Matthews", with a long horizontal flourish extending to the right.

Paul Matthews

Founder and CEO